

Remarks

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and the following remarks. Claims 2-18, 20, and 21 are pending in the application. Claims 2-12 and 21 are allowed. Claims 13-18 and 20 are rejected. Claims 2, 13, and 21 are independent. Claim 13 has been amended.

Cited Art

The Action cites Hind et al., U.S. Patent No. 6,772,331 (hereinafter “Hind”) and Dondeti et al., U.S. Patent No. 6,263,435 (hereinafter “Dondeti”).

Interview Summary

Applicants’ representative Stephen Wight (along with Ryan Fox) conducted an Interview with Examiner Shaw on November 26, 2008. Applicants thank the Examiner for taking the time to discuss the application. In the interview, Applicants’ representative suggested amending claim 13 to include language from pending claim 20, in part in response to the Examiner’s suggestion that “additional modification to clarify the claim limitation regarding the membership certificate and its signed items . . . is necessary for further consideration.” [Action, at § 12, page 9.] The Examiner indicated that he would consider the amendment and that, with such an amendment, claim 13 and its dependent claims may be allowable. Applicants’ representative also briefly discussed the patentability of claim 13 over the Dondeti reference.

Amendment and Claim Objection

Applicants respectfully note that claim 13 has been amended to recite language originally found in claim 20. Claim 13 now recites:

wherein each trust group membership certificate received after the security resolver is initialized is sent by an other device and each trust group membership certificates comprises:

a signed name for a trust group; and
a signed identifier for the other device sending the trust group membership certificate.

Applicants note the similarity between the added language of claim 13 and the language of claim 2, which is noted to be allowable in the Action based on “the limitations regarding the

membership certificate and the signature-related items associated with it.” [See, Action, at § 9, page 8.] For at least this reason, as well as the reasons discussed in the Examiner Interview of November 26, 2008, Applicants believe claim 13 to be allowable with this amendment.

Claim 13 is also objected to for informalities. [Action, at § 5, page 2.] Specifically, the Action notes that the claim incorrectly recites the language “operational to initialize the security resolver” as well as “a security resolver operational.” Claim 13 has been amended to recite “operational to initialize security *resolvers*.” [Emphasis added.] Applicants respectfully note that, with this amendment, the language of claim 13 should be free of informalities.

Claim Rejections

The Action rejects claims 13-18 and 20 under 35 U.S.C. § 103(a) as unpatentable over Hind in view of Dondeti. However, because Hind and Dondeti do not teach each and every element of the claims, the rejection is improper. Claim 13 is independent.

Claim 13 recites, in part:

the security initializer further operational to initialize security resolvers with the branding certificate, wherein the branding certificate comprises branding key data for verifying certificates provided by other devices within the trust group on the open-access network; and

a security resolver operational, after being initialized with the branding public key to authenticate trust group membership certificates separate from the branding certificate provided to the networked computing device from other devices via the network interface using the branding key data and to verify that the other devices providing trust group membership certificates are members of the trust group of devices, and further operational to inhibit interaction via the network interface with other devices not authenticated as in the trust group of devices, the security resolver being initially uninitialized;

Support for this language has been discussed in previous amendments, such as the amendment filed August 6, 2007. In the interest of expediency, Applicants will not belabor examples from the application.

The Action acknowledges that Hind does not teach or suggest the language quoted above, and finds disclosure in Dondeti. [Action, at § 7, pages 3-4.] In its rejection of the above-quoted language of claim 13, however, the Action cites to the passing of various certificates and messages in Dondeti, including a “capability certificate 50,” “message 104,” and an “authorization certificate 56.” [Action, at § 7, pages 3-4.] In particular, the Action cites to the

passage discussing the passing of these messages and certificates from columns 4 and 5 of Dondeti. Applicants quote the passage below in order to comment on what is described in Dondeti:

Referring to FIG. 4, when a new host H_1 wants to join the secure multicast group, it sends a message to all SGMs of the multicast group as illustrated at 101. The message includes host H_1 's capability certificate 50. After sending its message to all SGMs of the group, host H_1 waits until one of the SGMs answers. . . .

. . .

Host H_1 chooses the first positive response it receives (from SGM g_1) thereby choosing it as its subgroup manager.

The enrolling host H_1 then sends a message to the sender S , comprising authentication information about itself, the responding SGM's identity 52 and the corresponding keygroup identity 54. The authentication information may be either in the form of a capability certificate 50, or other identifier used by the sender to consult an access control list (a database of all hosts that can join).

The sender S uses the capability certificate 50 to decide whether H_1 is an authorized member of the multicast group. . . . After the new host's membership is validated, the sender generates message 104, containing a number of items including an authorization certificate 56.

The data structure of the presently preferred authorization certificate is shown in FIG. 3. The authorization certificate contains the new host's identity (H_1), the corresponding SGM's identity and the keygroup identity. Sender S_1 signs the certificate with its private key, as illustrated diagrammatically by lock 58. The authorization certificate is an authentic record of the new host's affiliation to the multicast group.

[Dondeti, at column 4, line 58 to column 5, line 21; emphasis added.] The other portions of Dondeti cited in the rejection refer to similar structures as the quoted passage.

Based on Dondeti's description of its certificates, Applicants note the following issues with the rejection over Doneti:

1) The "capability certificate" described in *Dondeti does not teach or suggest a "branding certificate compris[ing] branding key data for verifying certificates provided by other devices within the trust group on the open-access network."* This is because the "capability certificate" described in Dondetti contains no information used to identify "other devices." [See, Dondetti, at column 4, line 58 to column 5, line 21.]

2) If the “capability certificate” described in Dondeti is meant to read on the “trust group membership certificate” recited in claim 13 because it authenticates membership, then *it cannot also read on the “branding certificate” because claim 13 recites that “[the] trust group membership certificates [are] separate from the branding certificate.”*

3) If, instead, the “authorization certificate” described in Dondeti is meant to read on the “trust group membership certificate” recited in claim 13, Applicants note that the “capability certificate” and the “authorization certificate” of Dondeti are generated by two different entities (the “host” and the “sender,” respectively). [See, e.g., Dondeti, at column 5, lines 14-21.] As such, Dondeti teaches away from a “branding device having previously generated the branding certificate and trust group membership certificates,” as recited in claim 13.

Applicants note that these arguments were previously presented to the Examiner in the Proposed Agenda for the November 26, 2008 Examiner Interview. For both the reasons above, as well as the reasons discussed in the Interview, Applicants respectfully argue that the rejection of 13, as well as its dependent claims 14-18 and 20, is improper because Hind and Dondeti, taken either separately or in combination do not teach or suggest each and every element of claim 13. As such, claim 13, in particular as amended above, as well as its dependent claims, should be allowable. Applicants respectfully request the allowance of claims 13-18 and 20.

Interview Request

If the claims are not found by the Examiner to be allowable, the Examiner is requested to call the undersigned attorney to set up an interview to discuss this application.

Conclusion

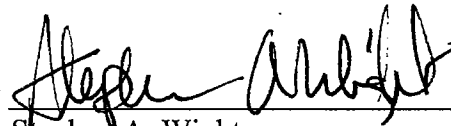
The claims in their present form should be allowable. Such action is respectfully requested.

Respectfully submitted,

KLARQUIST SPARKMAN, LLP

One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Telephone: (503) 595-5300
Facsimile: (503) 595-5301

By

A handwritten signature in black ink, appearing to read "Stephen A. Wight", is written over a horizontal line.

Stephen A. Wight
Registration No. 37,759